

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

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Plaintiff,

CLERK-ALBUQUERQUE

v.

Cause No. 05 CR 1849 JH

ADRIAN SANFORD,

Defendant.

MOTION TO AUTHORIZE OUT OF STATE TRAVEL

COMES NOW the Defendant, Adrian Sanford, by and through his counsel of record, Robert R. Cooper, and respectfully requests that this Court enter an Order authorizing Mr. Sanford to travel out of state and as grounds, Counsel for Defendant states:

1. Mr. Sanford is charged as a co-defendant in a four count Indictment filed with this Court on August 23, 2005 and as a co-defendant in a four count Superseding Indictment filed on April 25, 2006.

2. Mr. Sanford is scheduled to travel by airplane on Monday, July 17, 2006 from his home in Tucson, Arizona to San Diego, California for the purpose of a family vacation at Sea World. Mr. Sanford is scheduled to return to his home in Tucson, Arizona on Sunday, July 23, 2006.

3. Mr. Sanford has maintained contact with the undersigned attorney. Mr. Sanford is not a flight risk.

4. The undersigned counsel has contacted Assistant United States Attorney James Braun regarding this Motion. Mr. Braun has indicated that the Government does not oppose this Motion.

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WHEREFORE, Defendant Adrian Sanford respectfully requests that this Court enter an Order allowing Mr. Sanford to travel by airplane from his home in Tucson, Arizona to San Diego, California for the purpose of a family vacation from Monday, July 17, 2006 to Sunday, July 23, 2006.



ROBERT R. COOPER
Counsel for Defendant
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Authorize Travel Out of State was mailed to Assistant United States Attorney James Braun, P.O. Box 607, Albuquerque, New Mexico, 87103 on this 10 day of July, 2006.



ROBERT R. COOPER